

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DANIEL JOYCE, )  
Individually and on behalf of a class of others )  
similarly situated, )  
Plaintiff, )  
v. )  
JOHN HANCOCK FINANCIAL SERVICES, ) Civil Action No.05-11428 – WGY  
INC. SEVERANCE PAY PLAN and JOHN )  
HANCOCK FINANCIAL SERVICES, INC., )  
as Administrator and Fiduciary of the John )  
Hancock Financial Services, Inc. Severance )  
Pay Plan )  
Defendants. )  
)

**AFFIDAVIT OF SETH J. ROBBINS**

I, Seth J. Robbins, on my oath state as follows:

1. I am an attorney at the law firm of Todd & Weld LLP, which represents Plaintiff Daniel Joyce, individually and on behalf of a putative class of others similarly situated (“Plaintiff” or “Joyce”), in the above-referenced matter.
2. I make this affidavit on personal knowledge of the facts stated herein.
3. The documents attached as exhibits to Plaintiff’s LRD 56.1 Statement of Undisputed Material Facts are true copies of the following:

**EXHIBIT:**

1. John Hancock Financial Services, Inc. Severance Pay Plan.
2. Chart of REOD business.
3. E-mail from JH Communication to Hancock Employees of 11/21/02.

4. John Hancock Complex Questions and Answers, November 26, 2002.
5. Questions on Tower Complex Sale Answered in Q&A, 11/27/02.
6. 2002 Benefits Supplement to Your Summary Plan Description.
7. E-mail from Jeff Brown to Beacon from Hugh MacDonnell of Morgan Stanley of 02/19/03.
8. John Hancock Tower Complex Term Sheet for Purchase and Sale.
9. Hancock Press Release of 03/14/06.
10. Memorandum re: Comparable Job Definitions.
11. Hancock Press Release re: John Hancock Plans to Assign Portion of Information Technology Services to IBM.
12. Severance Memorandum and E-Mail Regarding ISSD outsourcing and definition of comparable jobs.
13. Letter from John Durnan to Daniel Joyce of 05/05/03.
14. Memorandum Re: Proposed Benefits for Beacon Capital Partners Management LLC Employees.
15. Correspondence from Joan M. DiCicco to Thomas Maloney.
16. Competitive Assessment of Beacon Capital Partners Management, LLC Benefits Package with respect to Hancock's Severance Pay Plan "Comparability Job" Eligibility.
17. Hewitt United States Salaried 2002-2003 (the "Hewitt Study").
18. Memorandum to: Prospective Beacon Capital Partner Management, LLC Employees.
19. Letter from Paul Crowley to Daniel Joyce of 05/30/03.

20. E-mail from Daniel Joyce to Joan M. DiCicco of 06/02/03 and E-mails from Joan M. DiCicco to Daniel Joyce of 06/03/03.
21. Hancock's Procedural Rules for Claims Appeals.
22. Letter from Peter Mongeau to Carlton Grant of 10/04/04.
23. Minutes of Company Benefit Appeal Committee of 11/16/04.
24. Minutes of Company Benefit Plan Appeal Committee of 12/9/04.
25. Letter from Carlton Grant on behalf of Appeal Committee of 12/16/04 ("Appeal Denial Letter").
26. E-mail from Seth J. Robbins to Karen Morton of 02/10/05.
27. Letter from Seth J. Robbins to Karen Morton of 06/23/05.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 25<sup>th</sup> DAY OF JULY, 2006.



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